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Counsel for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DZ Reserve and Cain Maxwell (d/b/a Max
Martialis), individually and on behalf of
others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendants.

Case No. 3:18-cv-04978-JD

**PARTIES' PROPOSED QUESTIONS FOR
JUROR QUESTIONNAIRE AND VOIR DIRE**

Date: September 18, 2025
Time: 1:30 pm PT
Court: Courtroom 11, 19th Floor
Hon. James Donato

1 The Parties respectfully submit this joint list of questions to aid in the selection of the jury.

2 In the interest of efficiency, the Parties suggest the that the following questions be included
3 in the “Case Specific Questions” section of the Juror Questionnaire:

- 4 1. Have you supervised anyone at any job or held a leadership position in any group,
5 club, or organization? What was your title and how many people did you supervise?
- 6 2. Do you have any work experience in advertising or marketing? What were the
7 specific job titles and how long did you work in the field?
- 8 3. Have you or any member of your household worked in the technology field? What
9 were the specific job titles and how long did you or they work in the field?
- 10 4. Do you have strong feelings about class actions or whether large companies or
11 technology platforms are being unfairly targeted in lawsuits?
- 12 5. Have you or anyone close to you ever worked at Meta Platforms (formerly known as
13 Facebook)?
- 14 6. Have you ever placed an advertisement on Facebook, Instagram, or another Meta
15 platform? If so, what are your thoughts on the experience?
- 16 7. Have you ever had a negative experience with Meta, Facebook, or Instagram?
- 17 8. Do you have any strong positive or negative opinions about Meta, Facebook,
18 Instagram, Mark Zuckerberg, or the people who run or have run Meta?
- 19 9. Do you have any strong positive or negative opinions about companies or people that
20 advertise their products on Meta Platforms (formerly known as Facebook)?

21 The Parties suggest the following questions for in-person *voir dire*, in addition to the
22 standard questions about whether the jurors know any of the attorneys or anticipated witnesses:

- 23 1. Any questions suggested above that the Court did not include in the Juror
24 Questionnaire.
- 25 2. Have you, or has anyone close to you, ever worked at a technology or social media
26 company?
- 27 3. Do you have any strong negative feelings about technology or social media
28 companies?
4. Have you ever had a bad experience advertising on the internet? How about
advertising on Facebook, Instagram, or Audience Network?
5. Have you heard or read anything about this case other than what you heard in Court
today?
6. Have you or anyone close to you had financial dealings with Meta, including stock
ownership or investment (other than mutual or index funds)?

1 DATED: September 4, 2025

Respectfully submitted,

2
3 By: Geoffrey Graber

By: Andrew B. Clubok

4 Geoffrey Graber (SBN 211547)
5 Karina G. Puttieva (SBN 317702)
6 Madelyn Petersen (*pro hac vice*)
7 Jenna Waldman (SBN 341491)
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SIGNATURE ATTESTATION

Pursuant to L.R. 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from all signatories

DATED: September 4, 2025

Respectfully submitted,

/s/ Geoffrey Graber

Geoffrey Graber